

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SAUNDRA ELION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 05-0992 (PLF)
	)	
ALPHONSO R. JACKSON,	)	
Secretary of the	)	
U.S. Dept. of Housing and	)	
Urban Development,	)	
	)	
Defendant.	)	
_____	)	

DEFENDANT’S RULE 26(a)(1) DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1) and the Court’s Scheduling Order, Defendant Alphonso R. Jackson, Secretary, U.S. Department of Housing and Urban Development, in his official capacity, makes the following initial disclosures:

I Individuals Likely to Have Discoverable Information.

- a) Sandra Elion, Plaintiff

- b) James A. Heist
Assistant Inspector General for Audit
451 7th St., S.W.
Rm. 8286
Washington, D.C. 20410
(202) 708-1783

Mr. Heist is Plaintiff’s supervisor. Mr. Heist has information relating to Plaintiff’s allegation that she was subjected to discrimination and retaliation when she was removed from her position as Director of OIG (Office of Inspector General) Headquarters Audits Division and reassigned to a nonsupervisory position. In addition, Mr. Heist has information relating to Plaintiff’s allegation that she was subjected to discrimination and

retaliation when she was not reassigned to a supervisory position as a senior auditor in OIG Headquarters. Finally, Mr. Heist has knowledge concerning Plaintiff claims that were raised in her previous EEO complaint.

- c) Michael R. Phelps
Deputy Assistant Inspector General for Audit
451 7th St., S.W.
Rm. 8286
Washington, D.C. 20410
(202) 708-0364

Mr. Phelps was previously Plaintiff's first level supervisor. Mr. Phelps has knowledge concerning Plaintiff's claims that were raised in her previous EEO complaint, including that management did not restore her staff, that her authority with her subordinates was undermined, and that she was not given recognition or awards for her work.

- d) Michael P. Stephens
Deputy Inspector General
451 7th St., S.W.
Rm. 8256
Washington, D.C. 20410
(202) 708-0430

Mr. Stephens has information relating to Plaintiff's allegation in her complaint that she was subjected to discrimination and retaliation when she was removed from her position as Director of OIG Headquarters Audits Division and reassigned to a nonsupervisory position. In addition, Mr. Stephens has information relating to Plaintiff's allegation that she was subjected to discrimination and retaliation when she was not reassigned to a supervisory position as a senior auditor in OIG Headquarters. Finally, Mr. Stephens has information concerning Plaintiff's claims that were raised in her previous EEO complaint.

- e) Dennis Raschka,
Director, Office of Management and Policy
451 7th St., S.W.
Rm. 8254
Washington, D.C. 20410
(202) 708-3635

Mr. Raschka possesses information pertaining to the reduction of FTEs (full time employees) within the Office of Audit and the cost

savings associated with closing the Capital Region Office of Audit.

- f) Edward Kim
Auditor
451 7th St., S.W.
Rm. 3162
Washington, D.C. 20410
(202) 708-1342

Mr. Kim has information pertaining to the work environment of the Headquarters Audit Division.

- g) Joan Hobbs
Regional Inspector General for Audit
611 West 6th St.
Suite 1160
Los Angeles, CA 90017
(213) 534-2470

Ms. Hobbs' information pertains to her reasons for transferring from the Capital District Office of Audit to Region 9.

- h) Martin Irizarry
Auditor
451 7th St., S.W.
Rm. 3162
Washington, D.C. 20410
(202) 708-0383

Mr. Irizarry's information pertains to complaints that he made concerning the management of the Headquarters Audit Division.

- i) Robert Gwin
Director, Technical Oversight & Planning
451 7th St., S.W.
Rm. 8180
Washington, D.C. 20410
(202) 708-0364

Mr. Gwin has information pertaining to his selection for the Director of the Technical Oversight and Planning Division.

- j) Cynthia (Cindi) Nelson
Former HUD OIG employee
700 North Moore Street
Suite 720
Arlington, VA 22209
703-284-2697

Ms. Nelson has information pertaining to the work environment at the Capital Region Office of Audit

- k) Leslie Moreno
451 7th St., S.W.
Room 5162
Washington, D.C. 20410
(202) 708-2091

Ms. Moreno's information pertains to the utilization and return of space at the North Capital Street location.

II. Documents.

- a) Official Personnel Folder of Saundra Elion, Maintained by the Bureau of Public Debt, 200 3rd St., Parkersburg, WV 26106.
- b) EEO Report of Investigation, held by the Agency's EEO Office.
- c) Plaintiff's medical records in the Plaintiff's possession.

III. Damages Computation. N/A

IV.. Insurance Agreement. N/A

Dated: October 28, 2005.

Respectfully Submitted,

_____/s/_____
KENNETH L. WAINSTEIN, D.C. BAR #451058
United States Attorney

_____/s/_____
R. CRAIG LAWRENCE, D.C. BAR #171538
Assistant United States Attorney

_____/s/_____
JOHN C. TRUONG, D.C. BAR #465901
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
(202) 307-0406

Attorneys for Defendant